

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CASE NO.: 09-CR-00045-DMC

UNITED STATES OF AMERICA

vs.

MICHAEL BRASSINGTON, and
PAUL BRASSINGTON

Defendant.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW the undersigned counsel who hereby files this Motion for Permission to Travel and in support thereof would show as follows:

1. The defendant's Michael and Paul Brassington are currently pending sentencing before this Court on April 11, 2011.
2. Each Defendant has requested permission to travel with their parents, Michael Brassington, Sr. and Gloria Brassington, by commercial airline to the State of California for the time period commencing December 22, 2010 through January 2, 2011.
3. The reason for this request is to stay at and visit with the Defendants' sister and her family. The Defendants' sister, Marylou Brassington Calvez, resides with her husband and two young children at 1437 Pleasant Oak Place, Thousand Oaks, California.
4. Prior to leaving, the Defendants' would provide to Pre-Trial Services the address, flight itinerary and phone numbers where they can be reached at all times.

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5. Each Defendant would also be willing to report to the local Pre-trial Services office in California as necessary. On December 2, 2010 the undersigned counsel's office contacted the Pre-Trial Services office at the United States Courthouse at 312 North Spring Street, Room 754, in Los Angeles, California, telephone (213) 894-4726, and was advised this was the closest office to Thousand Oaks, California.¹

6. Attorney Michael Salnick spoke telephonically with Assistant United States Attorney, Scott McBride on December 1, 2010 regarding this request on behalf of both Defendants and Mr. McBride authorized the undersigned to indicate that the Government had no objection as long as all information is provided to the Defendants' Pre-Trial Services officers prior to their departure.

WHEREFORE, each Defendant would respectfully request this Honorable Court grant this permission to travel as requested.

¹ This was related to the undersigned's office by Officer of the day Danny Yao.

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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, via by electronic transmission via CM/ECF, to SCOTT MCBRIDE, Assistant United States Attorney, Office of the United States Attorney, 970 Broad Street, Suite 700, Newark, New Jersey 07101, this 2nd day of December, 2010.

Respectfully submitted:

LAW OFFICES OF SALNICK, FUCHS & BERTISCH, P.A.
One Clearlake Centre, Suite 1203
250 South Australian Avenue
West Palm Beach, Florida 33401
Telephone: (561) 471-1000
Facsimile: (561) 659-0793

/s/ Michael Salnick

MICHAEL SALNICK, Fla. Bar #270962
New York Bar # 2007045

s/Bruce E. Reinhart

BRUCE E. REINHART, P.A.
One Clearlake Centre
250 S. Australian Avenue, Suite 1400
West Palm Beach, Florida 33401
561-202-6360
561-202-6976 (fax)